201-15456

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07/14/2004 10:38 PM

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Subject: Environmental Defense comments on 2,4,6-Tris[(Dimethylamino)methyl]phenol (CAS# 90-72-2)

(Submitted via Internet 7/14/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and hamiltce@apci.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2,4,6-Tris[(Dimethylamino)methyl]phenol (CAS# 90-72-2)

The test plan and robust summaries for 2,4,6-tris [(dimethylamino)methyl]phenol (TDAMP) were submitted by Air Products and Chemicals. The available information on TDAMP is presented in a clear and objective manner and the submission is consistent with the overall objectives of the HPV program. According to the test plan, TDAMP is used as a delayed-action gelation catalyst for rigid foams, as a curing agent and as a tertiary amine activator for some epoxy resins.

The sponsor states that dermal exposures may occur in the workplace but that stringent industrial hygiene practices are used to minimize worker exposure. No information is provided on environmental releases and opportunities for human exposure from environmental releases or from consumer products that may contain residues of TDAMP. This is an especially important consideration because TDAMP is considered non-biodegradable. Is TDAMP metabolized by mammalian systems, and if so are the metabolites potentially toxic?

The sponsor, based on an evaluation of the adequacy of existing data on SIDS endpoints, proposes to conduct an algal toxicity study, a combined repeat dose/reproductive/developmental study and a chromosomal aberration study. This proposal is consistent with our evaluation of the test plan and robust summaries, so we support the sponsor's test plan. In regards to the combined study, has the sponsor decided which route of exposure will be used? This decision needs to be based on pharmacokinetic considerations as well as relevant exposure circumstances for TDAMP. If dermal exposures are used, then supporting pharmacokinetic information needs to be provided demonstrating that TDAMP is absorbed through the skin and reaches the systemic circulation. Based on these concerns, we recommend that the combined study be conducted using an oral route of exposure. This route of exposure will also avoid the dermal corrosivity problems with TDAMP.

Thank you for this opportunity to comment.

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